

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

EMILY MACINTYRE and KEITH FITTS,
individually and on behalf of all others similarly
situated,

Plaintiffs,
vs.

CURRY COLLEGE,


Defendant.

Civil Action No.: 1:25-10585-NMG

**DECLARATION OF JULIAN HAMMOND IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANT’S SUPPLEMENTAL BRIEF IN SUPPORT OF
MOTION TO DISMISS**

1. I am the principal of HammondLaw, P.C., counsel of record for the named Plaintiffs in the above-referenced matter.
2. A Fall 2024 appointment letter issued by Curry College is attached as **Exhibit 1**.
3. Paychecks issued by Curry College pursuant to the Fall 2024 appointment letter, on October 1, 2024, November 1, 2024, December 1 2024, and January 1, 2025 are attached as **Exhibit 2**.
4. A Spring 2023 appointment letter issued by Curry College is attached as **Exhibit 3**.
5. Curry College’s 2022- 2023 academic calendar is attached as **Exhibit 4**.
6. Curry College’s 2024-2025 academic calendar is attached as **Exhibit 5**.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 3, 2025.



Julian Hammond (*admitted pro hac vice*)

EXHIBIT 1



OFFICE OF ACADEMIC AFFAIRS

1071 Blue Hill Avenue

Milton, MA 02186-2395

curry.edu • 617-333-2233 • Fax: 617-979-3535

August 1, 2024

I am pleased to offer you a teaching assignment within Curry College's Traditional Programs. This appointment carries with it all of the rights and responsibilities as described in the 2021-2024 Agreement between Curry College and the AAUP and is subject to all provisions of the Agreement. Please note that collective bargaining between the College and the AAUP is ongoing. Once finalized, the rights and responsibilities of full-time faculty articulated in the updated agreement will apply. The College reserves the right to cancel courses prior to the start of the course. When classes must be canceled for any reason (insufficient enrollment, etc.), every effort will be made to discuss the decision to cancel with the Department or Division Chair and/or Coordinator, prior to the first class. Should the class be canceled after this notification, or after the class has already met, you will be paid a cancellation fee of five percent of the course salary.

Rank: Lecturer**Course:** [REDACTED]**Title:** [REDACTED]**Contact Hours:** 3**Total Amount:** \$5972.1**Monthly Amount:** \$1493.03**Distribution:** October - January

If this course is delivered in a hybrid or fully online format, completion of the Faculty Readiness Process, including the building of the course in Canvas, is required for Faculty who teach Continuing Education courses. Without the proper preparation to teach in this format, this contract may be rescinded.

Additionally, all employees must complete the online Workplace Harassment Prevention Training course within their first 30 days of employment and re-certify every 3 years after. The Office of Human Resources will be in touch about this requirement. Additionally, the 2024-2025 Academic Calendar and Meetings and Events schedule can be found on [Faculty portal](#). Please note that your Curry College logon will be required to view these documents.

If you accept this appointment, please sign and return this letter to my office, by August 12, 2024. Your signed letter must be returned in order for our office to complete the faculty payroll. Additionally, please remember to submit your syllabi to Academic Affairs and the Levin Library by the first week of classes.

Sincerely,

Robert J. Shea, Jr., PhD.

Provost and Vice President of Academic Affairs

I accept the terms of the appointment

Aug 1, 2024

Date

EXHIBIT 2

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	010
MYV	000831	005371		0000390214	1

Earnings Statement

CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Period Beginning: 10/01/2024
Period Ending: 10/31/2024
Pay Date: 10/01/2024

Filing Status: Single/Married filing separately
Exemptions/Allowances:
Federal: Standard Withholding Table,\$200 Extra
Withholding

Earnings	rate	hours	this period	year to date
Regular		28.13	1,493.03	14,930.30
Gross Pay			\$1,493.03	14,930.30

Other Benefits and Information	this period	total to date
Ytd Curry Union		74.70

Deductions	Statutory		year to date
	Federal Income Tax	-218.68	1,929.65
	Social Security Tax	-92.57	925.68
	Medicare Tax	-21.65	216.49
	MA State Income Tax	-46.13	534.62
	Other		
	Curry Union	-7.47	
	Ma Fli Pvt Plan	-1.64	16.40
	Ma Mli Pvt Plan	-3.14	31.36
	403B Voya	-89.58*	895.80
	Net Pay	\$1,012.17	
	Check2	-1,012.17	
	Net Check	\$0.00	

Additional Tax Withholding Information

Taxable Marital Status:
MA: Single
Exemptions/Allowances:
MA: 1

*** Excluded from federal taxable wages**

Your federal taxable wages this period are
\$1,403.45

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CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Advice number: 00000390214
Pay date: 10/01/2024

Deposited to the account of	account number	transit	ABA	amount
				\$1,012.17

NON-NEGOTIABLE



██████████
██████████
MILTON, MA 02186

Period Beginning: 11/01/2024
Period Ending: 11/30/2024
Pay Date: 11/01/2024

Filing Status: Single/Married filing separately
Exemptions/Allowances:
Federal: Standard Withholding Table,\$200 Extra Withholding



Earnings	rate	hours	this period	year to date
Regular		28.13	1,493.03	16,423.33
Gross Pay			\$1,493.03	16,423.33

Other Benefits and Information	this period	total to date
Ytd Curry Union		82.17

Deductions	Statutory	
	Federal Income Tax	-218.68
	Social Security Tax	-92.57
	Medicare Tax	-21.65
	MA State Income Tax	-46.13
	Other	
	Curry Union	-7.47
	Ma Fli Pvt Plan	-1.64
	Ma Mli Pvt Plan	-3.14
	403B Voya	-89.58*
	Net Pay	\$1,012.17
	Check2	-1,012.17
	Net Check	\$0.00

Additional Tax Withholding Information
Taxable Marital Status:
MA: Single
Exemptions/Allowances:
MA: 1

* Excluded from federal taxable wages

Your federal taxable wages this period are
\$1,403.45

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CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Advice number: ██████████
Pay date: 11/01/2024

Deposited to	account of	account number	transit	ABA	amount
██████████	██████████	██████████	XXXX	XXXX	\$1,012.17

THIS IS NOT A CHECK

NON-NEGOTIABLE

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	010
MYV	000831	005371		0000480235	1

Earnings Statement

CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Period Beginning: 12/01/2024
Period Ending: 12/31/2024
Pay Date: 12/01/2024

Filing Status: Single/Married filing separately
Exemptions/Allowances:
Federal: Standard Withholding Table,\$200 Extra
Withholding

Earnings	rate	hours	this period	year to date
Regular		28.13	1,493.03	17,916.36
Gross Pay			\$1,493.03	17,916.36

Other Benefits and Information	this period	total to date
Ytd Curry Union		89.64

Deductions	Statutory		
	Federal Income Tax	-218.68	2,367.01
	Social Security Tax	-92.56	1,110.81
	Medicare Tax	-21.65	259.79
	MA State Income Tax	-46.13	626.88
	Other		
	Curry Union	-7.47	
	Ma Fli Pvt Plan	-1.64	19.68
	Ma Mli Pvt Plan	-3.14	37.64
	403B Voya	-89.58*	1,074.96
	Net Pay	\$1,012.18	
	Check2	-1,012.18	
	Net Check	\$0.00	

Additional Tax Withholding Information

Taxable Marital Status:
MA: Single
Exemptions/Allowances:
MA: 1

*** Excluded from federal taxable wages**

Your federal taxable wages this period are
\$1,403.45

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CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Advice number: 00000480235
Pay date: 12/01/2024

Deposited to the account of	account number	transit	ABA	amount
				\$1,012.18

NON-NEGOTIABLE

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	010
MYV	000831	005371		0000010228	1

Earnings Statement

CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Period Beginning: 01/01/2025
Period Ending: 01/31/2025
Pay Date: 01/01/2025

Filing Status: Single/Married filing separately
Exemptions/Allowances:
Federal: Standard Withholding Table,\$200 Extra
Withholding

Earnings	rate	hours	this period	year to date
Regular		28.13	1,493.03	1,493.03
Gross Pay			\$1,493.03	1,493.03

Other Benefits and Information	this period	total to date
Ytd Curry Union		7.47

Deductions	Statutory		
	Federal Income Tax	-218.68	218.68
	Social Security Tax	-92.57	92.57
	Medicare Tax	-21.65	21.65
	MA State Income Tax	-46.13	46.13
	Other		
	Curry Union	-7.47	
	Ma Fli Pvt Plan	-1.64	1.64
	Ma Mli Pvt Plan	-3.14	3.14
	403B Voya	-89.58*	89.58
	Net Pay	\$1,012.17	
	Check2	-1,012.17	
	Net Check	\$0.00	

Additional Tax Withholding Information

Taxable Marital Status:
MA: Single
Exemptions/Allowances:
MA: 1

*** Excluded from federal taxable wages**

Your federal taxable wages this period are
\$1,403.45

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CURRY COLLEGE
1071 BLUE HILL AVENUE
MILTON, MA 02186

Advice number: 00000010228
Pay date: 01/01/2025

Deposited to the account of	account number	transit	ABA	amount
				\$1,012.17

NON-NEGOTIABLE

EXHIBIT 3



CURRY COLLEGE

MILTON, MASSACHUSETTS 02186

 TELEPHONE (617) 333-2364
 FAX (617) 979-3535
 www.curry.edu

December 6, 2022

I am pleased to offer you a teaching assignment within Curry College's Traditional Programs. This appointment carries with it all of the rights and responsibilities as described in the current Agreement between Curry College and the AAUP and is subject to all provisions of the Agreement. The College reserves the right to cancel courses prior to the start of the course. When classes must be canceled for any reason (insufficient enrollment, etc.), every effort will be made to discuss the decision to cancel with the Department or Division Chair and/or Coordinator, prior to the first class. Should the class be canceled after this notification, or after the class has already met, you will be paid a cancellation fee of five percent of the course salary.

Rank: Lecturer	Course: [REDACTED]
Title: [REDACTED]	Contact Hours: 3
Total Amount: \$ 5,855.00 Monthly Amount: \$ 1,463.75	
Distribution: March - June	

If this course is delivered in a hybrid or fully online format, completion of the Faculty Readiness Process, including the building of the course in Canvas, is required for Faculty who teach Continuing Education courses. Without the proper preparation to teach in this format, this contract may be rescinded.

Please note that all faculty are required to receive a COVID-19 vaccination prior to the start of classes unless you are approved for a medical or religious waiver. Additionally, all employees must complete the online Workplace Harassment Prevention Training course within their first 30 days of employment and re-certify every 3 years after. The Office of Human Resources will be in touch about these requirements.

The 2022-2023 Academic Calendar and Meetings and Events schedule can be found on [Faculty portal](#). Please note that your Curry College logon will be required to view these documents.

If you accept this appointment, please sign and return this letter to my office as soon as possible. Your signed letter must be returned in order for our office to complete the faculty payroll. Additionally, please remember to submit your syllabi to Academic Affairs and the Levin Library by the first week of classes.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Shea, Jr."

 Robert J. Shea, Jr.
 Interim Provost

 I accept the terms of the appointment:

 Dec 12, 2022

Date

EXHIBIT 4



2022 – 2023 ACADEMIC CALENDAR

15-week Semester | Calendar subject to change due to external factors

FALL SEMESTER 2022

Traditional Undergraduate Students

New Student Check-In/Move-In Day	Thurs., August 25
New Student Welcome Weekend	Thurs., Aug. 25 – Sun., Aug. 28
Returning Student Check-In/Move-In Day	Sun., August 28
Residence halls open for returning students	
Academic Convocation	Mon., August 29
Classes begin	Mon., August 29, 12:30 p.m.
Labor Day, no classes, offices closed*	Mon., September 5
Course Add/Drop deadline	Tues., September 13
Indigenous Peoples' Day, no classes**, Offices closed*	Mon., October 10
Mid-term grades deadline	Wed., October 12
Course selection for Spring 2023	Mon., Oct. 24 – Fri., Nov. 4
Web Registration for Spring 2023	Mon., Oct. 31 – Fri., Dec. 2
Friday class schedule in effect	Tues., November 8
Veterans Day observed, no classes** Offices closed*	Fri., November 11
Course withdrawal deadline Grade/ Pass/Fail declaration deadline	Fri., November 18
Thanksgiving Recess, no classes** Offices* and residence halls close at noon on	Wed., Nov 23 – Sun., Nov. 27 Wed., Nov. 23
Residence halls reopen	Sun., Nov. 27, noon
Classes end	Mon., December 12, 10:00 p.m.
Final Examinations	Tues., Dec. 13 – Sat. Dec. 17, 10:00 p.m.
Residence halls close (Subject to change in the event of snow days; Students must leave res. halls no later than 24 hrs. after last scheduled exam)	Sun., December 18, noon
Final Exam Snow Day (if needed)	Sun., Dec. 18
Final grade submission deadline	Thurs., December 22, 10:00 p.m.
Offices closed*	Sat., December 24 – Mon., Jan. 2
Offices reopen*	Tuesday, Jan. 3

FALL SEMESTER 2022

CE/GRAD 8-WEEK TERM I & TERM II

Term I classes begin	Mon., August 29
Labor Day, no classes, offices closed	Mon., September 5
CE Grade/Pass/Fail declaration deadline	Sat., October 8
Course Withdrawal deadline	Sat., October 8
Term I classes end	Sat., October 22
Term II classes begin	Mon., October 24
Veterans Day, classes held	Friday, November 11
Thanksgiving Recess, no classes Offices close at noon on Wed., Nov. 23	Thurs., Nov. 24 – Sun., Nov. 27
CE Grade/Pass/Fail declaration deadline	Sat., December 3
Course Withdrawal deadline	Sat., December 3
Term II classes end	Sat., December 17

Winter Intersession 2023

Classes held	Wed., January 4 – Sun., January 22
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SPRING SEMESTER 2023

Traditional Undergraduate Students

Martin Luther King Day, no classes**, offices closed*	Mon., January 16
Residence halls reopen at 9 a.m. for new students, 10 a.m. for returning students	Sun., January 22
Final Registration/Check-in all students	Sun., January 22
Classes begin	Mon., January 23, 7:00 a.m.
Course Add/Drop deadline	Mon., February 6
Presidents' Day, no classes**, Offices closed*	Mon., February 20
Spring Recess, no classes** Residence halls close 7:00 p.m., Fri., March 10	Sat., March 11 – Sun., March 19
Residence halls reopen	Sun., March 19, noon
Mid-term grade submission deadline	Wed., March 22
Course selection for Fall 2023	Mon., Apr. 3 – Fri., Apr 14
Web Registration for Fall 2023	Mon., April 10 – Fri. May 5
Patriots Day, classes held, offices closed*	Mon., April 17
Course withdrawal deadline	Fri., April 28
Grade/Pass/Fail declaration deadline	Fri., April 28
Classes end	Mon., May 8, 10:00 p.m.
Final Examinations	Tues., May 9 – Sat., May 13, 10:00 p.m.
Residence halls close (Students must leave res. halls no later than 24 hrs. after last scheduled exam)	Sun., May 14, noon
Senior grades due 48 hours after scheduled exam, no later than	Mon., May 15, 10:00 p.m.
Final grade submission deadline	Thurs., May 18, 10:00 p.m.
School of Nursing Pinning Ceremony	Sat. May 20
Commencement	Sun., May 21

SPRING SEMESTER 2023

CE/GRAD 8-WEEK TERM III & TERM IV

Term III classes begin	Mon., January 23
President's Day, classes held	Mon., February 20
CE Grade/Pass/Fail declaration deadline	Sat., March 4
Course Withdrawal deadline	Sat., March 4
Term III classes end	Sat., March 18
Term IV classes begin	Mon., March 20
Patriots Day, classes held	Mon., April 17
CE Grade/Pass/Fail declaration deadline	Sat., April 29
Course Withdrawal deadline	Sat., April 29
Term IV classes end	Sat., May 13

SUMMER SESSION 2023

Summer I classes begin	Mon., May 22
Memorial Day, no classes, offices closed	Mon., May 29
Juneteenth, no classes, offices closed	Mon., June 19
CE Grade/Pass/Fail declaration deadline	Sat., July 1
Course Withdrawal deadline	Sat., July 1
Independence Day, no classes, offices closed	Tues., July 4
Summer I classes end	Sat., July 8
Summer II classes begin	Mon., July 10
CE Grade/Pass/Fail declaration deadline	Sat., Aug. 19
Course Withdrawal deadline	Sat., Aug. 19
Summer II classes end	Sat., Aug. 26

* Office staff should check with supervisor.

**CE/Grad accelerated eight-week classes held during this time. Please consult with the Division of Continuing and Graduate Studies for details.

EXHIBIT 5



2024 – 2025 ACADEMIC CALENDAR

Calendar subject to change due to external factors

FALL SEMESTER 2024

Traditional Undergraduate Students

New Student Check-In/Move-In Day	Thurs., Aug. 22
New Student Welcome Weekend	Thurs., Aug. 22 - Sun., Aug. 25
Returning Student Check-In/Move-In Day	Sun., August 25
Residence halls open for returning students	
Academic Convocation	Mon., August 26
Classes begin	Mon., August 26, 12:30 p.m.
Labor Day, no classes, offices closed*	Mon., September 2
Course Add/Drop deadline	Tues., September 10
Indigenous Peoples' Day, no classes**, Offices closed*	Mon., October 14
Mid-term grades deadline	Wed., October 16
Course selection for Spring 2025	Mon., Oct. 28 – Fri., Nov. 8
Web Registration for Spring 2025	Mon., Nov. 4 – Fri., Dec. 6
Veterans Day, no classes**	Mon., November 11
Offices closed*	
Monday class schedule in effect	Tues., November 12
Course withdrawal deadline	Fri., November 15
Grade/Pass/Fail declaration deadline	Fri., November 15
Thanksgiving Recess, no classes**	Wed., Nov 27 – Sun., Dec 1
Offices* and residence halls close at noon on	Wed., Nov. 27
Residence halls reopen	Sun., Dec 1, noon
Classes end	Mon., December 9, 10:00 pm
Final Examinations	Tues., Dec. 10 – Sat. Dec. 14, 10:00 p.m.
Residence halls close	Sun., December 15, noon
(Subject to change in the event of snow days; Students must leave res. halls no later than 24 hrs. after last scheduled exam)	
Final Exam Snow Day (if needed)	Sun., Dec. 15
Final grade submission deadline	Thurs., December 19, 10:00 p.m.
Offices closed*	Sat., Dec. 21 – Sun., Jan. 5
Offices reopen*	Mon., January 6

FALL SEMESTER 2024

CE/GRAD 8-WEEK TERM I & TERM II

Term I classes begin	Mon., August 26
Labor Day, no classes, offices closed	Mon., September 2
CE Grade/Pass/Fail declaration deadline	Sat., October 5
Course Withdrawal deadline	Sat., October 5
Indigenous Peoples' Day, classes held	Mon., October 14
Term I classes end	Sat., October 19
Term II classes begin	Mon., October 21
Veterans Day, classes held	Friday, November 11
Thanksgiving Recess, no classes	Thurs., Nov. 28 – Sun., Dec. 1
Offices close at noon on Wed., Nov. 27	
CE Grade/Pass/Fail declaration deadline	Sat., November 30
Course Withdrawal deadline	Sat., November 30
Term II classes end	Sat., December 14

Winter Intersession 2025

Classes held	Mon., Jan. 6 – Sun., Jan. 19
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SPRING SEMESTER 2025

Traditional Undergraduate Students

Residence halls reopen at 9 a.m. for new students, 10 a.m. for returning students	Sun., January 19
Final Registration/Check-in all students	Sun., January 19
Martin Luther King Day, no classes**, offices closed*	Mon., January 20
Classes begin	Tues., January 21, 7:00 a.m.
Course Add/Drop deadline	Tues., February 4
Presidents' Day, no classes**, Offices closed*	Mon., February 17
Monday class schedule in effect	Tues., February 18
Spring Recess, no classes**	Sat., March 8 – Sun., March 16
Residence halls close 7:00 p.m., Fri., March 7	
Residence halls reopen	Sun., March 16, noon
Mid-term grade submission deadline	Wed., March 19
Course selection for Fall 2025	Mon., March 31-Fri., Apr 11
Web Registration for Fall 2025	Mon., April 7 -Fri. May 2
Patriots Day, classes held, offices closed*	Mon., April 21
Course withdrawal deadline	Fri., April 25
Grade/Pass/Fail declaration deadline	Fri., April 25
Classes end	Tues., May 6, 10:00 p.m.
Final Examinations	Wed., May 7 – Mon., May 12, 10:00 p.m.
Residence halls close	Tues., May 13, noon
(Students must leave res. halls no later than 24 hrs. after last scheduled exam)	
Senior grades due 48 hours after scheduled exam, no later than	Wed., May 14., 10:00 p.m.
Final grade submission deadline	Sat., May 17, 10:00 p.m.
School of Nursing Pinning Ceremony	Sat. May 17
Commencement	Sun., May 18

SPRING SEMESTER 2025

CE/GRAD 8-WEEK TERM III & TERM IV

Term III classes begin	Tues., January 21
President's Day, classes held	Mon., February 17
CE Grade/Pass/Fail declaration deadline	Sat., March 1
Course Withdrawal deadline	Sat., March 1
Term III classes end	Sat., March 15
Term IV classes begin	Mon., March 17
Patriots Day, classes held	Mon., April 21
CE Grade/Pass/Fail declaration deadline	Sat., April 26
Course Withdrawal deadline	Sat., April 26
Term IV classes end	Mon., May 12

SUMMER SESSION 2025

Summer I classes begin	Mon., May 19
Memorial Day, no classes, offices closed	Mon., May 26
Juneteenth, no classes, offices closed	Thurs., June 19
CE Grade/Pass/Fail declaration deadline	Sat., June 28
Course Withdrawal deadline	Sat., June 28
Independence Day, no classes, offices closed	Fri., July 4
Summer I classes end	Sat., July 5
Summer II classes begin	Mon., July 7
CE Grade/Pass/Fail declaration deadline	Sat., Aug. 16
Course Withdrawal deadline	Sat., Aug. 16
Summer II classes end	Sat., Aug. 23

* Office staff should check with supervisor.

**CE/Grad accelerated eight-week classes held during this time. Please consult with the Division of Continuing and Graduate Studies for details.